



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

August 6, 2024

By Email

The Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: ***United States v. Eustate Espinal, et al., 23 Cr. 577 (LJL)***

Dear Judge Liman:

The Government writes to respectfully request that the motions conference scheduled for August 14, 2024 at 10:00 a.m. be adjourned. The deadline for defendants Wellington Eustate Espinal and Roberto Vargas Paulino to file pre-trial motions passed on July 15, 2024, without any motions being filed. Motions from Defendants Cristian Eustate Espinal and Heriberto Eustate Espinal are due to be filed on August 16, 2024. A conference on those motions is scheduled for September 11, 2024 at 2:00 p.m. Accordingly, because no motions will be pending before the Court on August 14, 2024, the Government respectfully requests that the proceeding scheduled for that date be cancelled.

If the Court is inclined to grant that request, the Government also respectfully requests that time between today and September 11, 2024, the date of the next scheduled proceeding in the case, be excluded so that defendants Cristian Eustate Espinal and Heriberto Eustate Espinal can attend to motions and the parties can attempt to negotiate a pretrial resolution of the case.

Counsel for each of the defendants has consented to these requests.

**REQUEST GRANTED.**

The Motion hearing scheduled for August 14, 2024 at 10:00AM is CANCELLED. The Court excludes time as to all defendants, on consent of all parties, under the Speedy Trial Act, 18 USC 3161(h)(7)(A) until September 11, 2024, based on the findings that the ends of justice outweigh the interests of the public and the defendants in a speedy trial in that the time until September 11 is necessary for the parties to continue plea negotiations and consider potential motions.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:

Maggie Lynaugh  
Chelsea Scism  
Adam Sowlati  
Assistant United States Attorney  
Tel: (212) 637-2448/2438/2105

8/6/2024 SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge